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*United Therapeutics Corporation*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Sandoz Inc. and RareGen, LLC,

Plaintiffs,

v.

United Therapeutics Corporation and  
Smiths Medical ASD, Inc.,

Defendants.

Civil Action No. 3:19-cv-10170-BRM-LHG

**DEFENDANTS' NOTICE OF  
MOTION FOR SANCTIONS**

**Honorable Brian R. Martinotti,  
U.S.D.J.**

**Return Date: November 18, 2019**  
***Oral Argument Requested***

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**PLEASE TAKE NOTICE** that on November 18, 2019, at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendants United Therapeutics Corporation (“UTC”) and Smiths Medical ASD, Inc. (“Smiths”), by and through their undersigned attorneys, shall move before the Honorable Brian R. Martinotti, United States District Judge, United States District Court, District of New Jersey, for an Order in the above-captioned matter, imposing sanctions on Plaintiffs Sandoz Inc. and RareGen, LLC for violating the Court’s Stipulated Protective Order, Dkt. No. 55.

**PLEASE TAKE FURTHER NOTICE** that Defendants will rely upon the accompanying Brief, Declaration of Adrienne E. Van Winkle, and Declaration of Christina Fahmy.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted with this motion.

Dated: October 15, 2019

**BLANK ROME LLP**

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**CERTIFICATION OF SERVICE**

I certify that on this date, I caused a copy of the foregoing Notice of Motion for Sanctions, with the accompanying Brief, Declaration of Adrienne E. Van Winkle, Declaration of Christina Fahmy, and proposed form of Order, to be served upon all counsel of record via the Court's ECF system and email.

Dated: October 15, 2019

/s/ Stephen M. Orlofsky  
STEPHEN M. ORLOFSKY